

cc: HG
4CRM Mary

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FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

JAN 15 2008

at 1 o'clock and 20 min. PM
SUE BEITIA, CLERK

ORIGINAL

Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

RAYMOND E. WARE;)	CIVIL NO. CV 04-00671 HG/LEK
)	
Plaintiff,)	PLAINTIFF'S WITNESS
)	STATEMENT;
vs.)	CERTIFICATE OF SERVICE
)	
MICHAEL CHERTOFF, Secretary,)	
Department of Homeland Security;)	
JOHN DOES 2-5,)	Trial Date: February 5, 2008
)	Time: 9:00a.m.
Defendants.)	Judge: Helen Gillmor
)	

PLAINTIFF'S WITNESS LIST

Comes now Plaintiff RAYMOND E. WARE, by and through his attorney,
Daphne E. Barbee, and submits the following witness names, pursuant to Rule 16
of the Federal Rules of Civil Procedure.

WITNESSES

1. RAYMOND E. WARE
c/o Attorney Daphne E. Barbee
1188 Bishop Street, Suite 1909
Honolulu, Hawaii 96813
2. KEN KAMAHELE
Former Deputy Director of TSA
Honolulu
c/o Assistant U.S. Atty Tom Helper
300 Ala Moana Blvd., Room 6-100
Honolulu, Hawaii 96850
3. SIDNEY HAYAKAWA
Former TSA Director Honolulu
c/o Assistant U.S. Atty Tom Helper
300 Ala Moana Blvd., Room 6-100
Honolulu, Hawaii 96850
4. MILAGROS DRAKE
91-1033 Hokuwekiu Street
Kapolei, Hawaii 96707
5. ROGER IOYAGI
TSA Employee
c/o Assistant U.S. Atty Tom Helper
300 Ala Moana Blvd., Room 6-100
Honolulu, Hawaii 96850
6. JOSE ABRANTE
TSA Employee
c/o Assistant U.S. Atty Tom Helper
300 Ala Moana Blvd., Room 6-100
Honolulu, Hawaii 96850

**SUMMARY OF EXPECTED
TESTIMONY**

Plaintiff will testify concerning discrimination on the basis of race and retaliation at TSA Honolulu and damages.

Will testify with respect to promotion decisions, liability and working conditions at TSA Honolulu.

Will testify concerning working conditions at TSA and decision making regarding promotions.

Will testify with regards to Mr. Ware's good work as a supervisor and her observations regarding working conditions at TSA Honolulu.

Will testify with regards to Mr. Ware's work and the working conditions at TSA Honolulu.

Will testify with regards to Mr. Ware's work and the working conditions at TSA Honolulu.

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| 7. CYNTHIA ALBERT
TSA Employee
c/o Assistant U.S. Atty Tom Helper
300 Ala Moana Blvd., Room 6-100
Honolulu, Hawaii 96850 | Will testify with regards to Mr. Ware's work and the working conditions at TSA Honolulu.(Via video conference or telephone) |
| 8. ALLEN WILEY
Former TSA Employee Personnel Officer
1916 Pike Place, Suite 12, Box 8
Seattle, Washington 98101-1097 | Will testify regarding the work atmosphere at TSA Honolulu and retaliation. |
| 9. ELI WATERS, SR.
Former AKAL and TSA Employee
145 Muliwai Avenue
Wahiawa, Hawaii 96786 | Will testify regarding the work atmosphere at TSA and Plaintiff's work. |
| 10. HANEEF BILAL ABDUL SHAFIQ
1624 Liholiho Street #1
Honolulu, Hawaii 96822 | Will testify with regards to damages and how the lack of promotion affected Mr. Ware. |
| 11. CHING CHU WARE
c/o Attorney Daphne E. Barbee
1188 Bishop Street, Suite 1909
Honolulu, Hawaii 96813 | Will testify regarding damages and how the lack of promotion affected Mr. Ware. |
| 12. TERRY SUDOVAL
Former TSA Employee
11C Dole Road
Wahiawa, Hawaii 96786 | Will testify regarding Mr. Ware's work and understanding of the SOP as Screening Supervisor. |
| 13. ROBIN WONG
TSA Employee and Supervisor
c/o Assistant U.S. Atty Tom Helper
300 Ala Moana Blvd., Room 6-100
Honolulu, Hawaii 96850 | Will testify regarding Mr. Ware's work and the atmosphere at TSA Honolulu. |

14. FARHA RAHMAN
EEO Counselor for TSA
Honolulu
c/o Assistant U.S. Atty Tom Helper
300 Ala Moana Blvd., Room 6-100
Honolulu, Hawaii 96850
Will testify Mr. Ware contacted her in June 2003 regarding race discrimination, lack of promotion opportunities.
15. CTSS Earl Yamasaka
TSA Employee
c/o Assistant U.S. Atty Tom Helper
300 Ala Moana Blvd., Room 6-100
Honolulu, Hawaii 96850
Will testify about credibility of Mr. Kamahale and retaliation.
16. TSS Lauren McMillian
TSA Employee
c/o Assistant U.S. Atty Tom Helper
300 Ala Moana Blvd., Room 6-100
Honolulu, Hawaii 96850
Will testify regarding credibility of Mr. Kamahale and retaliation.
17. Dennis Clark
TSA Western Director
c/o Assistant U.S. Atty Tom Helper
300 Ala Moana Blvd., Room 6-100
Honolulu, Hawaii 96850
Will testify regarding credibility of Mr. Kamahale.
18. Brian Akizaki
TSA Employee
c/o Assistant U.S. Atty Tom Helper
300 Ala Moana Blvd. Room 6-100
Honolulu, Hawaii 96850
Will testify regarding working with Plaintiff.
19. Any witnesses listed on Defendant's witness list.
20. Rebuttal witnesses.

DATED: Honolulu, Hawaii, 1-14-08.

Daphne E. Barbée
DAPHNE E. BARBEE
Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF HAWAII

RAYMOND WARE,)	CIVIL NO. 04-00671 HG LEK
)	
Plaintiff,)	CERTIFICATE OF SERVICE
)	
vs.)	
)	
MICHAEL CHERTOFF, Secretary,)	
Department of Homeland Security;)	
JOHN DOES 2-5,)	
)	
Defendants.)	
_____)	

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was duly served upon the following parties at their last known addresses by means of hand delivery on this date.

EDWARD H. KUBO, JR., ESQ.
U.S. Attorney
THOMAS A. HELPER, ESQ.
Assistant U.S. Attorney
Rm. 6-100, PJKK Federal Building
300 Ala Moana Blvd.
Honolulu, Hawaii 96850

Attorneys for Federal Defendants

DATED: Honolulu, Hawaii, 1-15-08.

DAPHNE E. BARBEE
Attorney for Plaintiff